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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THOMAS SCHUENEMAN,

Plaintiffs

v.

1st CREDIT OF AMERICA, LLC., JOHN
DOE, AKA MR. SMYKAL; DOE ABC
COMPANY; and DOES 3 through 20,
inclusive;

Defendants

Civil Case No.: C 05-04505 MHP

~~PROPOSED ORDER FOR~~
CONTINUANCE OF INITIAL CASE
MANAGEMENT CONFERENCE

Plaintiff respectfully requests that the Court enter the following proposed Order for Continuance of the Initial Case Management Conference. The reasons for this request are set forth in the attached letter to the Honorable Marilyn Patel (e-filed on February 28 as **Document 5**).

The parties through their attorneys have agreed that the defendants shall have until April 12, 2006 to answer the complaint. The email agreement between the parties is set forth below.

Dated March 1, 2006

s/Eric F. Fagan
Eric F. Fagan, Attorney for Plaintiff

1 From: Callaghan, Lawrence [Larry.Callaghan@TuckerEllis.com] Sent: Tue 2/28/2006 3:30 PM
2 To: efagan@efaganlaw.com
3 Cc: Vuong, Nhien
4 Subject: Ext of Time To Answer: Civetello, C 05 04944 WHA; and Schueneman C 05-04505 MHP

5 Mr. Fagan: this email will confirm our conversation of this date that you have agreed to extend defendant 1st Credit Of
6 America's time to Answer the above styled cases for five weeks from March 8, 2006, that is until: April 12, 2006.

7 In the interim, it is my understanding that you will serve us with the ADR Scheduling Orders, Orders Related to Setting Initial
8 Case Management Conference and related Court documents. I have also agreed to get back to you with respect to the DOE
9 pleading.

10 I appreciate your courtesy in this regard. Larry Callaghan

11 Lawrence A. Callaghan
12 Tucker Ellis & West LLP
13 One Market Street, Steuart Tower
14 Suite 1300
15 San Francisco, CA 94105
16 phone: (415) 617-2225
17 fax: (415) 617-2409
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PROPOSED ORDER

IT IS HEREBY ORDERED as follows:

1. The Initial Case Management Conference shall be continued to **April 3, 2006 at 4 p.m.**
2. Last day to meet and confer re initial disclosures, early settlement, ADR process selection, and discovery plan: **March 13, 2006.**
3. Last day to file Joint ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference: **March 13, 2006.**
4. Last day to complete initial disclosures or state objection in Rule 26(f) Report, file/serve Case Management Statement, and file/serve Rule 26(f) Report: **March 27, 2006.**
5. Joint Management Statement and Proposed Order due **April 16, 2006.**
6. Joint Case Management Conference to be on **May 1, 2006.**

Dated March 3, 2006

